

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 05-111-KAJ
	:	
KATSIARYNA KABIARETS,	:	
	:	
Defendant.	:	

MOTION TO EXTEND TIME TO FILE PRETRIAL MOTIONS

The defendant, through undersigned counsel, hereby moves this Court for an extension of time to file pretrial motions for the below stated reasons:

1. Ms. Kabiarets is charged with several counts of Identity Theft, a charge of Credit Card Fraud Conspiracy, and Aggravated Identity Theft.
2. Ms. Kabiarets was indicted on December 15, 2005 and was arraigned on January 5, 2006.
3. Counsel needs more time to prepare pretrial motions due to obligations in other cases, the need to research a novel issue in this case, and the investigation required of this case.
4. Ms. Kabiarets will waive any speedy trial claim during this brief continuance.
5. Douglas McCann, Counsel for the Government does not oppose this request.

WHEREFORE, for the above reasons, and any such other reason that shall appear to the Court, the defense requests additional time to determine if pretrial motions will be filed. The defense will advise the Court of the case status by March 17, 2006.

/s/

Penny Marshall, Esquire
Federal Public Defender
First Federal Plaza
704 King Street, Suite 110
Wilmington, DE 19801
(302) 573-6010
Attorney for Ms. Kabiarets

Dated: March 3, 2006

CERTIFICATE OF SERVICE

Undersigned counsel certifies that a copy of Motion for Extension of Time to File Pretrial Motions is available for public viewing and downloading and was electronically delivered on March 3, 2006 to:

Douglas McCann
Assistant United States Attorney
1007 Orange Street,
Suite 700
Wilmington, DE 19801

/s/
Penny Marshall
Federal Public Defender
First Federal Plaza
704 King Street, Suite 110
Wilmington, DE 19801
(302) 573-6010
Attorney for Ms. Joyce

Dated: March 3, 2006